

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	No. 4:20CR142
	§	Judge Jordan
	§	
DANIEL AUSTIN DUNN	§	
a/k/a Whiskey.Tango10	§	
a/k/a Osama bin Drinkin	§	
a/k/a @SirAustinOfDunn	§	

ELEMENTS OF THE OFFENSE

The defendant, **Daniel Austin Dunn**, is charged in Count One of the Indictment with a violation of 18 U.S.C. § 875(c), Interstate Communications (Threats). The essential elements which must be proved beyond a reasonable doubt in order to establish a violation of this section are:

18 U.S.C. § 875(c) (Threats)

1. That the defendant intentionally transmitted a communication containing a true threat to injure the person of another, as charged; and
2. That the threat was transmitted in interstate commerce through an internet communications platform.

Respectfully submitted,

STEPHEN J. COX
United States Attorney
Eastern District of Texas

/s/_____
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via CM-ECF electronic filing to defense counsel on this 17th day of December 2020.

/s/_____
TRACEY M. BATSON